

### **REMARKS**

Claims 1-31 are currently pending. Applicants appreciate the Examiner's detection and renumbering of the current claims 30 and 31, which were misnumbered as claims 31 and 32 in the Preliminary Amendment. Applicants have used the new numbering in the presentation of claims beginning on page 2 of this Response and in the discussion of all rejections below. No new matter has been added.

#### **I. Double Patenting Rejection**

The Examiner has rejected claims 1-31 on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 1-32 of U.S. Patent No. 6,625,609. Applicants have submitted a Terminal Disclaimer concurrently with this Response that obviates the double patenting rejection, and respectfully request that the rejection of claims 1-31 be withdrawn.

#### **II. Claims 1-15, 24-28 and 30-31**

No rejection of claims 1-15, 24-28 and 30-31 has been made by the Examiner other than the double patenting rejection. Claims 1, 9, and 24 have been amended to more distinctly claim applicants' invention. Since the double patenting rejection has been obviated, applicants believe that claims 1-15, 24-28 and 30-31 are now in condition for allowance.

#### **III. Anticipation Rejection of Claims 16, 20, and 29**

The Examiner has rejected claims 16, 20, and 29 under 35 U.S.C. § 102(b) as being anticipated by US Patent No. 6,081,814 to Mangat et al (hereinafter Mangat).

##### ***A. Discussion of Mangat***

The Examiner alleges that Mangat teaches a computer system for navigating within a body of data using one of a plurality of distinct browse graphs. Specifically, it appears

that the Examiner is arguing that Mangat describes a system having a number of reference environments (9:20-25), that each reference environment is defined by a definition (9:5-6), and that the definition may be used to place access restrictions on the ability of a user or group of users to access a particular environment (26:57-65). Since browser access to the reference environments may be limited by the access rights placed on that environment (25:10-18), the Examiner concludes that different browse graphs must be used during navigation of the various environments.

Applicants respectfully submit that even under the interpretation suggested by the Examiner, Mangat fails to disclose the use of "a plurality of browse graphs" or a "first browse graph" and a "second browse graph" to navigate within a body of data. As interpreted by the Examiner, Mangat discloses allowing a user to navigate within a single browse structure where access restrictions are placed on certain of the nodes in the browse structure. Navigating within a single browse structure is a substantially different technique than applicants' method of enabling navigation using a number of different browse graphs. Applicants' system uses different browse graphs so that various users can navigate a body of information in a manner that best suits their needs. Mangat fails to provide users with a navigation experience that is suited to them, and fails to disclose the use of multiple browse graphs. As discussed below with respect to each independent claim, applicants submit that the anticipation rejection is therefore improper because Mangat does not teach all of the limitations of any independent claim in the present application.

*B. Independent Claim 16*

Independent claim 16, as amended, is directed to a method for navigating with a body of data using one of a plurality of browse graphs. Each of the plurality of browse graphs has a "different node structure." Based on information contained in a navigation request, one of the plurality of browse graphs is selected to allow a user to browse the body of data.

As discussed above, Mangat does not disclose or suggest allowing a user to navigate a body of data using multiple browse graphs having different node structures. Claim 16 is therefore patentably distinct over Mangat, as are the claims that depend from claim 16.

*C. Independent Claim 20*

Independent claim 20, as amended, is directed to a computer-readable medium whose contents cause a computer system to navigate within a body of data using one of a plurality of distinct browse graphs. Each of the plurality of browse graphs has a "different node structure." In response to user input, the body of data is browsed using the selected browse graph.

As discussed above, Mangat does not disclose or suggest navigating a body of data in response to user input using multiple browse graphs having different node structures. Claim 20 is therefore patentably distinct over Mangat, as are the claims that depend from claim 20.

*D. Independent Claim 29*

Independent claim 29, as amended, is directed to a computer system for browsing a body of data. The system includes "a browse graph store that contains a plurality of browse graphs having different node structures." In response to a navigation request received by a receiver, one of the browse graphs is selected to browse the body of data.

As discussed above, Mangat does not disclose or suggest browsing a body of data using multiple browse graphs having different node structures. Claim 29 is therefore patentably distinct over Mangat, as well as the claims that depend from claim 29.

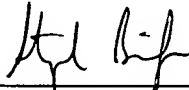
IV. Conclusion

For the reasons set forth above, applicants request that the outstanding rejections be withdrawn. By focusing on specific claims and claim limitations in the discussion above, applicants do not intend to imply an agreement with the Examiner's assertions regarding other claims and claim limitations.

If the Examiner believes that a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-3129. Otherwise, applicants respectfully request reconsideration of this application and its early allowance.

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Respectfully submitted,

By   
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Stephen C. Bishop  
Registration No.: 38,829  
PERKINS COIE LLP  
P.O. Box 1247  
Seattle, Washington 98111-1247  
(206) 359-8000  
(206) 359-7198 (Fax)  
Attorney for Applicant